

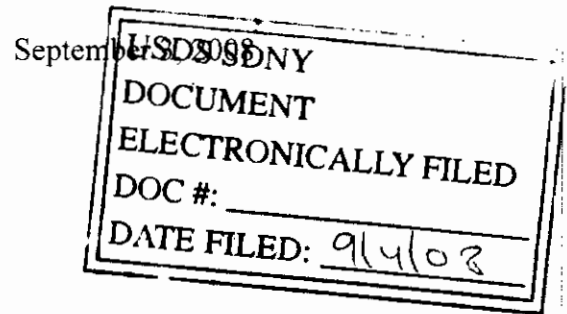


MEMO ENFORCED

SEP 04 2008
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BY HAND

Honorable Richard J. Sullivan
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St., Room 2210
New York, NY 10007

Re: Ayellet Moas et al., v. City of New York, et al, 08 CV 7239 (RJS)

Your Honor:

I am an Assistant Corporation Counsel in the Special Federal Litigation Division of the New York City Law Department handling the defense of this action on behalf of defendant City of New York. I am writing with the consent of plaintiffs' counsel David Pressman, Esq., to request an sixty-day enlargement of time, until November 3, 2008, within which this office may answer or otherwise respond to the complaint. This is the City's first request for an enlargement of time in this action.

The plaintiffs allege, *inter alia*, that the City of New York, through its agents, unlawfully stopped, seized, detained, and used excessive force on plaintiffs.

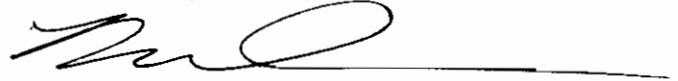
Before this office can adequately respond to the complaint, we will need to conduct an investigation into the facts of the case and forward to plaintiffs for execution authorizations for the release of medical information related to this matter. Without the underlying records, the defendant cannot properly assess this case or respond to the complaint. Accordingly, the enlargement of time will afford us the opportunity to investigate the matter and to secure the relevant documents.

Additionally, pursuant to Section 50-k of the New York General Municipal Law, this office must determine, based on a review of the case, whether we may represent the individually named defendants, once they are identified. The Officer(s) must then decide whether he wishes to be represented by this office. If so, we must obtain his written authorization. Only after this procedure has been followed can we determine how to proceed in this case.

In view of the foregoing, the defendant respectfully request that the Court grant the enlargement extending its time to answer or otherwise respond to the complaint until November 3, 2008.

Thank you for your consideration in this regard.

Respectfully submitted,



Brian G. Maxey (BM 0451)

BY FAX: (212) 529-0644

David Pressman, Esq.

Request granted. Defendant's time in which to answer or otherwise respond to the complaint is extended to November 3, 2008. No further extensions will be granted absent compelling circumstances.

SO ORDERED

Dated:


RICHARD J. SULLIVAN
U.S. J.